

Matthew W. Gissendanner
Senior Counsel
Dominion Energy Services, Inc.

220 Operation Way, MC C222, Cayce, SC 29033
DominionEnergy.com



January 29, 2021

VIA ELECTRONIC FILING

The Honorable Jocelyn G. Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29210

RE: Dominion Energy South Carolina, Incorporated's Establishment of a
Solar Choice Metering Tariff Pursuant to S.C. Code Ann. Section 58-40-
20 (See Docket No. 2019-182-E)
Docket No. 2020-229-E

Dear Ms. Boyd:

Enclosed for filing on behalf of Dominion Energy South Carolina, Inc. ("DESC")
is DESC's First Set of Discovery Requests to the North Carolina Sustainable Energy
Association and Solar Energy Industries Association.

By copy of this letter DESC is providing a copy of these requests to the parties
of record and encloses a certificate of service to that effect.

If you have any questions or need anything further, please do not hesitate to
contact me.

Very truly yours,

A handwritten signature in blue ink that reads "Matthew W. Gissendanner".

Matthew W. Gissendanner

MWG/kms

Enclosure

cc: Jeffrey M. Nelson, Esquire
Jeffrey W. Kuykendall, Esquire
Jenny R. Pittman, Esquire
Frank Knapp, Jr.

Thadeus B. Culley, Esquire
R. Taylor Speer, Esquire
Katherine Lee Mixson, Esquire
David I. Neal, Esquire

(all via electronic mail only w/enclosures)

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2020-229-E

Dominion Energy South Carolina, Inc.'s)	DOMINION ENERGY
Establishment of a Solar Choice Metering Tariff)	SOUTH CAROLINA,
Pursuant to S.C. Code Ann. Section 58-40-20)	INC.'S FIRST SET OF
)	DISCOVERY REQUESTS

TO: NORTH CAROLINA SUSTAINABLE ENERGY ASSOCIATION AND SOLAR ENERGY INDUSTRIES ASSOCIATION

Pursuant to S.C. Code Ann. Regs. §§ 103-833 and 103-835, and Rule 36 of the South Carolina Rules of Civil Procedure (“SCRCP”), Dominion Energy South Carolina, Inc. (“DESC”), by and through its undersigned counsel, requests that North Carolina Sustainable Energy Association and Solar Energy Industries Association (collectively, the “Intervenors”) admit or deny the following requests to admit, answer the corresponding interrogatories under oath and produce all documents or other materials responsive to the corresponding requests for production (collectively, the “Discovery Requests”) within twenty (20) days of the date of service hereof to the address of the undersigned, set forth below.

INSTRUCTIONS

IT IS HEREIN REQUESTED:

1. That all information, documents, and other materials be provided to the undersigned in the format as requested.
2. That all responses to the below Discovery Requests be labeled using the same numbers as used herein.

3. That if the requested information, documents, or other materials are found in other places or in other exhibits, reference not be made to those, but, instead, that the information, documents, or other materials be reproduced and placed in the responses to the interrogatory or requests for production in the appropriate sequence.

4. That any inquiries or communication relating to questions concerning clarifications be directed to the undersigned.

5. Provide copies of the information responsive to each Discovery Request in native electronic working format with all data (including source data) and formulas intact in an unprotected and unlocked form to allow auditing and verification of inputs, methods, and formulas.

6. That each Discovery Request be reproduced at the beginning of the response thereto.

7. That the Intervenor provide the undersigned with responses to the Discovery Requests as soon as possible, but not later than twenty (20) days from the date of service hereof.

8. If the response to any Discovery Request is that the information requested is not currently available, state why the information is not currently available and when the information requested will become available.

9. The Discovery Requests be deemed continuing so as to require the Intervenor to supplement or amend their responses as any additional information, documents, or other materials become available up to and through the date of hearing.

10. If a privilege not to answer is claimed, identify and describe each matter as to which privilege is claimed, the nature of the privilege, and the legal and factual basis for each such claim. In the event that a claim of privilege is raised pursuant to a common interest, provide the common interest agreement or joint defense agreement upon which the privilege is raised.

11. If a refusal to answer is based upon the grounds that same would be unduly burdensome, identify the number and nature of documents needed to be searched, the location of the documents, and the number of man hours and costs required to conduct the search.

12. Answer based upon the entire knowledge of the Intervenors, including information in the possession of the Intervenors, their respective officers, members, parents, subsidiaries, directors, consultants, representatives, agents, experts, and attorneys, if any.

13. If any Discovery Request cannot be answered in full, answer to the extent possible and specify the reasons for Your inability to provide a complete answer.

14. Please provide responses to the Requests electronically. To the extent this is impracticable, the responses, including any responsive documents, should be provided at the address of the undersigned, set forth below, or some mutually convenient location otherwise agreed to by the parties.

DEFINITIONS

1. The term “Docket” shall mean Commission Docket No. 2020-229-E.

2. The term “communication(s)” when used in these Discovery Requests shall include the transmittal of information by any means, written, oral, electronic or otherwise.

3. The terms “Intervenors,” “You,” and “Your” shall mean North Carolina Sustainable Energy Association and Solar Energy Industries Association, together with their respective employees, agents, consultants, experts (including Justin R. Barnes), subsidiaries, affiliates, parent, and other operational or functional units and all officers, directors, owners, members, employees, agents, and representatives of these entities. The terms also include all other persons acting on behalf of the Intervenors.

4. The term “DESC” shall mean Dominion Energy South Carolina, Inc., formerly South Carolina Electric & Gas Company, together with its employees, agents, consultants, experts, subsidiaries, affiliates, parents, and other operational or functional units and all officers, directors, owners, members, employees, agents, and representatives of these entities. It also includes all other persons acting on behalf of DESC.

5. The term “DESC Solar Choice Tariffs” means the net energy metering tariffs proposed by DESC in this Docket and filed on December 15, 2020, in this Docket.

6. The terms “document(s)” shall mean all written, recorded or graphic matters whatsoever and all non-identical copies thereof, including but not limited to papers, books, records, letters, photographs, correspondence, communications, electronic mail, text messages, social media records, telegrams, cables, telex messages, evidences of payment, checks, memoranda, notes, notations, work papers, transcripts, minutes, reports, recordings of telephone or other conversations, statements, summaries, opinions, studies, analyses, evaluations, contracts, agreements, jottings, agendas, bulletins, notices, announcements, advertisements, guidelines, charts, manuals, brochures, publications, schedules, price lists, subscription lists, customer lists, journals, statistical reports, desk calendars, appointment books, diaries, lists, tabulations, newsletters, drafts, proofs, galleys, or other prepublication forms of materials, telephone lists or indexes, rolodexes, computer printouts, data processing program libraries, data processing input and outputs, microfilm, microfiches, CD-ROMs, books of account, records or invoices reflecting business operations, all records kept by electronic, photographic, or mechanical means, any notes or drafts relating to any of the foregoing, and any other documents as defined in Rule 34 of the SCRCF of any kind in Your possession, custody or control or to which You have access or

knowledge of its existence. The above list is not meant to be exhaustive but to demonstrate the breadth of the items that may be considered “documents.”

7. The terms “identify” or “identity” used with reference to an individual means to state his or her full name, present or last known address, present or last known position and business affiliation, and employer, title, and position at the time in question. If the person was an officer, director, trustee, commissioner, or employee, also state the job title and areas of responsibility.

8. The terms “identify” or “identity” used with reference to a writing means to state the date, author, type of document (e.g., letter, memorandum, telegram, chart, note, application, etc.), or other means of identification, and its present location or custodian. If any such document is no longer in Your possession or subject to Your control, state what disposition was made of it.

9. The term “person” shall mean any individual, partnership, firm, association, corporation, government agency, or other business or legal entity.

10. The terms “relating to,” “relate to,” and “related to” mean directly or indirectly, expressly or implied, mentioning, describing, pertaining to, being connected with, or reflecting upon the subject matter of the specific request.

11. The term “Testimony” means Witness Barnes’s direct testimony and exhibits, if any, submitted in this Docket.

12. Please construe “and” as well as “or” either disjunctively or conjunctively as necessary to bring within the scope of these Discovery Requests any information which might otherwise be construed outside their scope.

REQUEST FOR ADMISSION

1. Admit that South Carolina is a “higher penetration” state, as such term is used on lines 16-17 on page 11 of your Testimony.

INTERROGATORIES

1. To the extent You denied any Request for Admission above, for each Request for Admission denied, state separately, with particularity and in detail, the basis and reasons for such denial and state the full name, title, job description if applicable, phone number, and present or last known business and residence addresses of any witness(es) having any information regarding or who may testify regarding the basis for Your denial.

2. Identify all documents known to You containing Your estimates of bill savings under the DESC Solar Choice Tariffs, whether included in the Testimony or otherwise.

3. Describe with detail and specificity the method, including all studies, data, and supporting assumptions (including elasticity information for bill savings and installation rates), by which you calculated the bill amounts in Table 7 of the Testimony.

4. Identify all regulatory bodies known to You that require customers to have “access to at least 12 months of interval usage data” prior to be placed upon a time-of-use rate in an NEM tariff, as You suggest on lines 3-4 on page 5 of the Testimony.

5. Identify all regulatory bodies known to You that have held time-of-use rates under a net energy metering program to be discriminatory on the sole basis that such rates differ from those available to non-net energy metering customers.

6. Identify all regulatory bodies known to You that have held a basic facilities charge under a net energy metering program to be discriminatory on the sole basis that such charges differ from those available to non-net energy metering customers.

7. Describe with detail and specificity the “other states” described on lines 7-11 on page 11 of your Testimony, which notes that “other states’ net metering successor programs apply variations of ‘monthly retail netting and rollover’ and ‘monetary crediting for all exports.’”

8. Describe with detail and specificity the definitions of the following headings that appear on Table 1 of the Testimony:

- a. Added Fixed Charge; and
- b. Added Minimum Bill

9. Describe with detail and specificity the definition of “higher penetration” as used on lines 16-17 on page 11 of your Testimony, which describes “higher penetration solar markets.”

10. Describe with detail and specificity all measures taken by You to compare the export rates in Table 2 of the Testimony against the retail rates in the respective states.

11. Identify each state in Table 1 of the Testimony in which “negative economic impacts” quantitatively influenced the development of a net energy metering program.

12. Identify each jurisdiction known to You “with lower DG penetration rates that have . . . adopted highly punitive DG compensation regimes,” as described on lines 7-9 on page 13 of the Testimony.

13. Identify each jurisdiction known to You that factor “the top 20 hours . . . rather than the top 20 days” as described on lines 6-8 on page 21 of the Testimony.

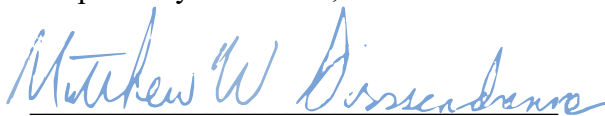
14. Describe with detail and specificity the basis for Your statement on lines 1-2 on page 13 of the Testimony that the distributed generation industry located within the states in Table 1 “has a more significant economic impact” than in other states.

15. Describe with detail and specificity the “certain surcharges” mentioned on line 22 on page 13 of the Testimony.

REQUESTS FOR PRODUCTION

1. Produce all documents identified, described, relied upon, or referred to in responding to DESC's First Set of Interrogatories served contemporaneously herewith.
2. Produce all communications identified, described, relied upon, or referred to in responding to DESC's First Set of Interrogatories served contemporaneously herewith.

Respectfully Submitted,



K. Chad Burgess, Esquire
Matthew W. Gissendanner, Esquire
Dominion Energy South Carolina, Inc.
Mail Code C222
220 Operation Way
Cayce, South Carolina 29033-3701
Phone: (803) 217-8141
Fax: (803) 217-7810
Email: chad.burgess@dominionenergy.com
matthew.gissendanner@dominionenergy.com

*Attorneys for Dominion Energy South Carolina,
Inc.*

Cayce, South Carolina
This 29th day of January, 2021.

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2020-229-E

Dominion Energy South Carolina, Inc.'s)
Establishment of a Solar Choice Metering Tariff)
Pursuant to S.C. Code Ann. Section 58-40-20)
_____))
_____)

**CERTIFICATE OF
SERVICE**

This is to certify that I have caused to be served on this day one (1) copy of **DOMINION ENERGY SOUTH CAROLINA, INC.'S FIRST SET OF DISCOVERY REQUESTS** via electronic mail upon the persons named below, addressed as follows:

Frank Knapp, Jr.
fknapp@knappagency.com

Katherine Lee Mixson
klee@selcsc.org

Jeffrey M. Nelson
jnelson@ors.sc.gov


David L. Neal
dneal@selcsc.org

Jeffrey W. Kuykendall
jwkuykendall@jwklegal.com

R. Taylor Speer
tspeer@turnerpadget.com

Jenny R. Pittman
jpittman@ors.sc.gov

Thadeus B. Culley
thad@votesolar.org



Karen M. Scruggs

This 29th day of January, 2021